

EXHIBIT 3

Caplan & Ross, LLP
Firm Bio

The attorneys of Caplan & Ross, LLP have a long standing track record of successfully representing clients in entertainment, intellectual property and commercial litigation. Caplan & Ross' extensive experience in the entertainment sector has equipped it with the proper tools to advocate for its clients in disputes involving copyright and trademark infringement, royalty and licensing agreements, royalty accountings, breach of contract claims and defamation actions. The firm's clients include significant entertainment and sports figures, respected commercial enterprises and family owned businesses. Leading recording artists and producers, independent record companies and music publishers, and others in the entertainment industry, as well as major sports figures, trust Caplan & Ross to fight for their intellectual property and contractual rights, and to represent them in other business litigation:

- The attorneys of C&R were appointed Co-Counsel to Plaintiffs in *Puckett v. SONY Music*, a precedent setting music case in which class certification was obtained for recording artist seeking compensation for underreporting of foreign record royalties, a case which was resolved favorably to the class.
- C&R's attorneys have represented leading recording artists, performing around the country, in legal actions to seize non-licensed bootleg merchandise.
- C&R successfully assisted a song writer/music publisher in her quest to reacquire her multimillion dollar publishing catalogue in a highly contested legal proceeding.
- The firm's lawyers have represented a number of top-selling recording artists in litigations against major recording labels, seeking to recover royalties due under their recording agreements.
- C&R has represented one of France's best-known musical groups in actions against copycat bands usurping their name, and the venues permitting them to perform.
- Its attorneys recently helped a garment industry licensor recover over \$1,000,000 from one of its licensees.
- C&R has represented several musical groups in connection with claims made against them by departing band members.
- Over the years C&R has successfully represented both bands and managers in various management disputes.

Brian D. Caplan, who founded Caplan & Ross in 2007, has more than 23 years' experience litigating a broad range of entertainment, intellectual property and commercial matters. His clients have included recording artists and producers, publishing companies, record labels, personal managers, business management, accounting firms, professional athletes, and dealers in fine art. In addition to contractual disputes, defamation cases and the prosecution and defense of copyright and trademark infringement actions, Mr. Caplan has represented clients in a broad range of disputes relating to partnerships and closely held corporations, and employment matters. Mr. Caplan is frequently called upon to speak at seminars conducted in the United States and abroad and at select universities with respect to intellectual property matters and the dynamics of the entertainment industry. He is an annual Lecturer before the Southern Regional Entertainment & Sports Law Symposium and has lectured as an authority on United States copyright law before the International Association of Entertainment Lawyers annual Midem conference in France.

Mr. Caplan is a member of the Westchester County and New York State Bar associations, the Copyright Society of the United States, the International Association of Entertainment Lawyers, and the Media and Entertainment Roundtable. Mr. Caplan earned a B.A. from Brandeis University in 1982 and a J.D. from Pace University School of Law in 1984. He is admitted to practice in New York and before the following federal courts: the United States Courts of Appeals for the First, Second and Ninth Circuits; the United States District Courts for the Southern and Eastern Districts of New York; and the United States District Court for the Northern District of California.